

**Exhibit A**

**Proposed Order**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

ASHINC CORPORATION, *et al.*,

Debtors.

Chapter 11

Case No. 12-11564 (CSS)

(Jointly Administered)

CATHERINE E. YOUNGMAN, LITIGATION  
TRUSTEE FOR ASHINC CORPORATION, ET.  
AL., AS SUCCESSOR TO THE OFFICIAL  
COMMITTEE OF UNSECURED CREDITORS  
OF ASHINC CORPORATION, AND ITS  
AFFILIATED DEBTORS

Plaintiff,

BDCM OPPORTUNITY FUND II, LP, BLACK  
DIAMOND CLO 2005-1 LTD., and SPECTRUM  
INVESTMENT PARTNERS, L.P.,

Intervenors,

v.

YUCAIPA AMERICAN ALLIANCE FUND I,  
L.P., and YUCAIPA AMERICAN ALLIANCE  
(PARALLEL) FUND I, L.P.,

Defendants.

Civil Action No. 21-cv-1650 (CFC)

Adv. Proc. No. 13-50530 (CSS)

CATHERINE E. YOUNGMAN, LITIGATION  
TRUSTEE FOR ASHINC CORPORATION, ET  
AL., AS SUCCESSOR TO BDCM  
OPPORTUNITY FUND II, LP, BLACK  
DIAMOND CLO 2005-1 LTD., SPECTRUM  
INVESTMENT PARTNERS, L.P., BLACK  
DIAMOND COMMERCIAL FINANCE, L.L.C.,  
as co-administrative agent, and SPECTRUM  
COMMERCIAL FINANCE LLC, as co-  
administrative agent,

Plaintiff,

v.

YUCAIPA AMERICAN ALLIANCE FUND I,  
L.P., and YUCAIPA AMERICAN ALLIANCE  
(PARALLEL) FUND I, L.P.,

Defendants.

Civil Action No. 21-cv-1649 (CFC)

Adv. Proc. No. 14-50971 (CSS)

**ORDER GRANTING MOTION FOR LEAVE TO FILE SUPPLEMENTAL BRIEF IN  
SUPPORT OF MOTION OF YUCAIPA AMERICAN ALLIANCE FUND I, L.P. AND  
YUCAIPA AMERICAN ALLIANCE (PARALLEL) FUND I, L.P. FOR ENTRY OF AN  
ORDER PURSUANT TO 28 U.S.C. § 157(d) AND BANKRUPTCY RULE 5011(a)  
WITHDRAWING THE REFERENCE OF ADVERSARY PROCEEDINGS**

At Wilmington this \_\_\_\_\_ day of \_\_\_\_\_, 2021, having considered the *Motion for Leave to File Supplemental Brief in Support of Motion of Yucaipa American Alliance Fund I, L.P. and Yucaipa American Alliance (Parallel) Fund I, L.P. for Entry of an Order Pursuant to 28 U.S.C. § 157(d) and Bankruptcy Rule 5011(a) Withdrawing the Reference of Adversary Proceedings* (the “Motion for Leave”); IT IS HEREBY ORDERED that the Motion for Leave is GRANTED and the Supplemental Brief attached as Exhibit B to the Motion for Leave is deemed properly filed and part of the record on the Withdrawal Motion.

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United States District Judge